

CV-16-DE-1

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA

2016 AUG 17 P 12:22

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
NOTICE TO FILING PARTY

It is your responsibility to  
notify the clerk in writing of any  
address change.

Failure to notify the clerk may  
result in dismissal of your case  
without further notice.

77851

Inmate Identification Number:

Thomas Gaddis

(Enter above the full name of the plaintiff  
in this action)

vs.

Circuit Judge, Julian King

Circuit Judge, William Hollinsworth

District Judge, Jeb Fennin

District Attorney Steven Giddens

(Enter above full name(s) of the defendant(s)  
in this action)

OFFICER, MICHAEL YANT  
OFFICER STEPHEN LEOBETTER

THIS LAWSUIT IS  
AGAINST THE 29th  
JUDICIAL CIRCUIT  
OF  
TALLADEGA, ALABAMA

## I. Previous lawsuits

- A. Have you begun other lawsuits in state or federal court(s) dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes ( )

No (X)

- B. If the answer to (A) is "yes," describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuit(s) on another piece of paper, using the same outline.)

## 1. Parties to this previous lawsuit:

Plaintiff:

N/A

Defendant(s):

N/A

2. Court (if Federal Court, name the district; if State Court, name the county) \_\_\_\_\_
3. Docket number N/A
4. Name of judge to whom case was assigned N/A
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) N/A
6. Approximate date of filing lawsuit N/A
7. Approximate date of disposition N/A

II. Place of present confinement Tallahassee County Jail

A. Is there a prisoner grievance procedure in this institution?

Yes ( ) No ( ☒ )

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure? Yes ( ) No ( ☒ )

C. If your answer is YES:

1. What steps did you take? N/A

2. What was the result? denied

D. If your answer is NO, explain why not: denied

III.

## Parties.

In item (A) below, place your name in the first blank and place your present address in the second blank.

A. Name of Plaintiff(s)

Thomas Gaddis

Address

Talladega County Jail  
Talladega, AL 35161

In item (B) below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use Item (C) for the names, positions, and places of employment of any additional defendants.

B. Defendant

Circuit Judge J. L. King

Is employed as

Judge Williams Hollinsworth District

at Judge Jeb Fawcett District Attorney Steven

C. Additional Defendants

Giddens - Officer Michael Vaut Officer  
Stephen F. D. Better - 148 East Street Judicial  
Buildings Talladega Alabama 35161

IV.

## Statement of Claim

State here, as briefly as possible, the FACTS of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets, if necessary.

The name defendant. Herein of The 29th  
Judicial Circuit of Talladega AL conspired  
together under color of state law willful  
took unconstitutional documents deprived plaintiff  
Gaddis of his rights, privilege, life, liberties,  
immunity that was protected, secured by the

CONSTITUTION AND LAWS OF THE UNITED STATES  
WITHOUT THE SHOWING OF PROBABLE CAUSE OR  
DETERMINATION OF PROBABLE CAUSE, ON BELIEF  
SUMMARIES AND INVALID WARRANT.

V. RELIEF

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

- ① 4th Amendment determination of probable cause
- ② Compensatory, and punitive damages.
- ③ Defendants sued in their OFFICIALS CAPACITY
- ④ Whatever the court deem proper, AND ANY  
Appropriate Relief Here UNDER USC 42 1983 &

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 8-15-2016

Thomas Gaddis  
SIGNATURE

ADDRESS TALLADEGA COUNTY JAIL  
P.O. BOX B.  
TALLADEGA, AL. 35161  
AIS # 77851

# CIRCUMSTANCES, CONDITIONS AND ALLEGATIONS ① OF

The 29th Judicial Circuit of Talladega, Alabama Have conspired together while acting under the color of state law, willfull, conspiring with and threw, their state law, enforcement. officers and willfull, without cause. arrests, without the showing of probable cause, and place into confinement an inhabitant a citizen, of the United States without due process of law and equal protection of law. plaintiff Thomas Gaddis.

defendant officer, Michael Yant on, Sept. 4. 2015 Exceeded the limits, of his authority, while acting under the color of state law, he acted in the name for the state, clothed, with state's power, of the 29th circuit of Talladega, Alabama willfull without cause of the showing of probable cause, arrested plaintiff and place him into confinement.

ON Sept. 4. 2015 defendant Yant took a previously prepared form complaint, that were accompanied by a separate Affidavit. And say that he have probable cause, for believing and does believe, that on Sept 4 2015 Plaintiff Gaddis was in possession, of a controlled substance, possession, of MARIJUANA second degree, and Felony paraphernalia. while near 400 Cooper Field Circle Sylacauga Alabama Talladega County.



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defendant VANT. Acted in the name for the state. With the 29th Judicial Circuit of Alabama Took That same complaint defendant VANT, ① He was the complainant officer, ② He were the states only witness ③ He preferred the warrant, ④ He also executed the warrant.

defendant VANT ON, Sept 4, 2015, Took this same INSUFFICIENT, DEFICIENCIES, ILLEGAL UNLAW FULL AND UNCONSTITUTIONAL criminal complaint without the showing of probable cause.

defendant VANT submitted this Form. Complaint to defendant DISTRICT JUDGE. FRANKLIN, AS the sole evidence supporting of that warrant, defendant FRANKLIN ISSUED this warrant, From the arrest that failed the showing of probable, that warrant also failed to meet minimal, 4th Amendment, Constitutional standards.

defendant JEB FRANKLIN, Failed to make a 4th Amendment determination of probable cause.

(2)

defendant OFFICER STEPHEN LED BETTER ON OCT 13, 2015 EXCEEDED THE LIMITS OF HIS AUTHORITY. WHILE ACTING UNDER THE COLOR OF STATE LAW, HE ACTED IN THE NAME FOR THE STATE, CLOTTED WITH STATE'S POWER OF THE 29<sup>th</sup> CIRCUIT OF TALLADEGA, ALABAMA WITHOUT CAUSE OF THE SHOWING OF PROBABLE CAUSE, ARRESTED PLAINTIFF AND PLACED HIM INTO CONFINEMENT.

ON OCT 14, 2015, defendant LED BETTER TOOK A PREVIOUSLY PREPARED FORM COMPLAINT THAT WERE UNCOMPRIMISED BY A SEPARATE AFFIDAVIT AND SAW THAT HE HAS PROBABLE CAUSE FOR BELIEVING AND DOES BELIEVE THAT ON OCT 13, 2015 PLAINTIFF GADDIS WAS MANUFACTURING A CONTROLLED SUBSTANCE, IN THE SECOND DEGREE, AND POSSESSION OF DRUG PARAPHEMERALS (FELONY) WHILE NEAR 1239 N. MAIN AVE. SYLACAUGA, TALLADEGA COUNTY ALABAMA.

defendant JUDGE JEB FRANKLIN FAILED TO MAKE A 4<sup>th</sup> AMENDMENT DETERMINATION OF PROBABLE CAUSE.

(3)

PLAINTIFF THOMAS GADDIS HAS FILED MOTIONS INTO THE 29<sup>th</sup> JUDICIAL CIRCUIT OF TALLADEGA, ALABAMA, CIRCUIT COURTS. PLAINTIFF HAVE ALSO WRITTEN LETTERS PERSONALLY TO defendant CIRCUIT JUDGE JULIAN KING, defendant WILLIAM NOLLINSWORTH, defendant DISTRICT ATTORNEY STEVEN GIDDENS, PLEADING UNTO THEM THAT PLAINTIFF GADDIS WERE ARRESTED IN BOTH CASES WITHOUT A SHOWING OF PROBABLE CAUSE AND THAT PLAINTIFF HAVE BEEN DEPRIVED OF HIS CONSTITUTIONAL RIGHTS WITHOUT DUE PROCESS OF LAW AND EQUAL PROTECTION OF LAW.

(4)

Plaintiff also submitted The Unconstitutional documents To The 29th Circuit names defendants criminal complaints, That were without A showing OF Probable Cause, OR A determination OF Probable Cause. Showing The Defendants OF The 29th Circuit conspired while acting under, The color OF State Law, After Haven, notice informed, with A causal connection within The 29th Circuit, will full turn A blind eye and A deaf ear And disregard That plaintiff Gaddis have been UNCONSTITUTIONAL Arrested without the showing OF Probable Cause on Criminal complaints documents That Against Alabama Rules OF Criminal procedural, Statutes and Codes, Against common law, Against United States Supreme Court Constitutions, And Laws OF The United States

When the 29th Judicial Circuit, Upheld And pass these Unconstitutional documents Thru District And Circuit Court That have clearly deprived plaintiff, OF his LIFE, The Fourteenth Amendment's protection Against deprivations, OF Liberty, without due process OF LAW,



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(5)

When The 29th Judicial Circuit, was Acting Under The Color Of State Law, acting in the name of the state, clothed with states power, Should 29th Circuit Of Alabama, know or should have known,

By virtue of its incorporation into Fourteenth Amendment The Fourth Amendment Requires the states to provide A Fair And Reliable determination of probable cause AS A condition for any significant pretrial Restraint OF Liberty.

The probable cause determinations must be made by A Judicial officer, either before or promptly After Arrest

The 29th Circuit have disregarded These Constitutional's Provision, And willfull Restraint OF Liberty plaintiff Thomas Gadd's deprivation OF his Constitutional Right

The 29th Circuit OF Alabama names defendant Have conspired together enter into A unconstitutional scheme, ON A belief summary, That should have last for only 12 hour, And willfull deprived plaintiff OF his LIFE without due process OF Law, or Equal Protection OF Law, ON A Invalid warrant without The showing OF probable cause, OF the 4th Amendments Warrant Clauses.

(6)

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The 29th Judicial of Alabama name de Defendants  
Herein This CIVIL Rights ACTION UNDER 42 U.S.C. SEC  
1983 & INTEN TO THIS CONSPIRACY AGAINST PLAINTIFF  
THOMAS GADDIS.

The 29th JUDICIAL ALSO DISCRIMINATED AGAINST  
PLAINTIFF THOMAS GADDIS BECAUSE OF HIS RACE.  
PLAINTIFF WERE SINGLE OUT, SOUGHT AFTER, WERE  
SUBJECT TO PUNISHMENT PAINS, AND PENALTIES BECAUSE  
OF HIS RACE.

PLAINTIFF THOMAS GADDIS WERE A INNOCENT FREEDMEN  
INHABITANT OF THE UNITED STATES WHO WAS ARRESTED  
BECAUSE OF HIS RACE, WITHOUT THE SHOWING OF PROBABLE  
CAUSE,

WHEN THE 29th JUDICIAL CIRCUIT OF ALABAMA  
DISCRIMINATED AGAINST PLAINTIFF HEREIN, PLAINTIFF  
SUFFER DIFFERENCES, PUNISHMENT, AS A CITIZENS OF THE  
UNITED STATES UNDER THE 14th AMENDMENT EQUAL PROTECTION  
CLAUSE.

PLAINTIFF THOMAS GADDIS, WAS WILLFULL CHARGE TWICE  
AND PUT IN JEOPARDY, IN THE CASE. DC 2015, 100697  
MANUFACTURING A CONTROLLED SUBSTANCE IN THE SECOND  
DEGREE, AND POSSESSION OF DRUG PARAPHERNALIA BOTH  
CHARGES IS LAB COMPONENTS, PRECURSOR SUBSTANCES THIS  
WAS A WILLFULL SCHEME TO HOLD PLAINT IN JAIL ON A  
'00.000.00 THOUSANDS DOLLARS BOND ON MANUFACTURING,  
THIS ACT WERE VIOLATION UNDER THE 5th AMENDMENT CLAUSES,

## STATEMENT OF CLAIMS

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①

The 29th Judicial Circuit of Talladega County was Acting Under Color of State Law, Willfully, and Without Cause Arrested and Placed Into Confinement An Inhabitant of The United States, Without The Showing of Probable Cause. Existed At All An Innocent Citizen, Plaintiff Thomas Gaddis, deprives him of his Rights, privilege and Immunity That was secured and protected, by The Constitution and Laws of the United States.

②

The 29th Judicial Circuit name defendants Herein is without any Authority of Law and without any Reasonable colorable Cause, and defendants, Conspired Together and Willfully deprived Plaintiff of His Life Contrary to Law, the defendant conspired, subjected The Plaintiff to the deprivation of His, Liberty, and Constitutional Rights, of The 14th Amendment.

③

The 29th Judicial Circuit of Talladega AL, Conspired Together, Under Color of Law, MISUSE, of power. Clothed with the Authority, acted in the name of the State, disregarded the Constitution, Rights of 4th Amendment provides That no warrant shall be issued upon probable cause 5th Amendment provides that nor shall any person be deprived of Life Liberty or property without due process of Law, the State name defendant Herein, Should have known, that The mandates of The 14th Amendment, provides, nor shall any States deprive any person of, Life Liberty or property without the process of Law and Equal protection of Law.



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And Laws OF The United States, Shall Be Liable to the  
 party, INJURED IN AN ACTION AT LAW SUIT IN EQUITY  
 OR other proper proceeding FOR REDRESS 42 USC 1983

④

The 29th CIRCUIT JUDICIAL CIRCUIT, HAVE WILLFULLY  
 CONSPIRED CONSPIRING, holding plaintiff Gaddis  
 ON A knowingly INVALID WARRANT SINCE OCT. 13, 2015  
 ACTING UNDER THE COLOR OF STATE LAW, WITHOUT ANY  
 JURISDICTION, OF LAW, WITHOUT determination OF probable  
 cause, WILLFULLY, depriving A innocent citizen A  
 INHABITANT OF THE UNITED STATES WILLFULLY DEPRIVED OF  
 ALL RIGHTS, privilege AND immunity THAT plaintiff Gaddis  
 WAS protected AND SECURED UNDER THE CONSTITUTION AND  
 LAWS OF THE UNITED STATES. 42 USC 1983.

The 29th JUDICIAL CIRCUIT IS WITHOUT SHOWING OF  
 PROBABLE CAUSE WILLFULLY DEPRIVED INNOCENT CITIZEN. AN  
 INHABITANT OF THE UNITED STATES. OF HIS LIFE.

Their CONDUCTED

WHEN THE 29th JUDICIAL, WERE ACTING UNDER THE COLOR  
 OF STATE LAW, SHOULD HAVE KNOWN, THAT THEIR CONDUCT,  
 VIOLATES, A CLEARLY ESTABLISHED FEDERAL STATUTORY  
 CONSTITUTIONAL RIGHTS OF plaintiff THOMAS GADDIS,  
 WHICH A REASONABLE PERSON, WOULD HAVE KNOWN.

The 29th JUDICIAL CIRCUIT OF TALLADEGA SHOULD  
 BE HELD LIABLE FOR THIS DEPRIVATION OF, plaintiff  
 THOMAS GADDIS CONSTITUTIONAL RIGHTS.

X Thomas Gaddis

Executed 8-15-2016



ADDITIONAL CLAIMS.

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The 29<sup>th</sup> JUDICIAL CIRCUIT OF Talladega, Alabama IS A SYSTEM THAT HAVE CONSPIRED TOGETHER WHILE ACTING UNDER THE COLOR OF STATE LAW, AND WILLFULLY WITHOUT ANY AUTHORITY OF LAW, AND WITHOUT ANY REASONABLE COLORABLE CAUSE, AND WILLFULLY DEPRIVED A INNOCENT CITIZEN AN INHABITANT OF THE UNITED STATE, PLAINTIFF, THOMAS GADDIS, OF HIS RIGHTS, PRIVILEGE, AND IMMUNITY WHEREAS PLAINTIFF WAS SECURED AND PROTECTED BY THE CONSTITUTION, AND LAW OF THE UNITED STATES, 42 USC 1983 &

②

The 29<sup>th</sup> JUDICIAL CIRCUIT, NAMES DEFENDANTS HEREIN DEFENDANT JUDGE JULIAN KING DEFENDANT JUDGE WILLIAMS HOLMISWORTH, DEFENDANT JUDGE JEB FANNIN DEFENDANT DISTRICT ATTORNEY STEVEN GEDDEN, DEFENDANT OFFICER MICHAEL YANT, DEFENDANT OFFICER STEPHEN LEDBETTER, HAVE CONSPIRED TOGETHER, WHILE ACTING UNDER COLOR OF LAW, TOOK AWAY MY LIFE WITH LAWS THAT CONTRARY TO LAW, SUBJECTED THE PLAINTIFF, THOMAS GADDIS, TO THE DEPRIVATION OF HIS LIFE LIBERTIES, AND ALL HIS CONSTITUTIONAL RIGHTS OF THE 14<sup>th</sup> AMENDMENT, 42 USC 1983 &

The 29<sup>th</sup> CIRCUIT NAMES DEFENDANT HAVE CONSPIRED AGAINST PLAINTIFF THOMAS GADDIS ARRESTED WITHOUT CAUSE, OR THE SHOWING OF PROBABLE CAUSE, WILLFULLY RESTRAINT OF LIBERTY, AS A CITIZEN OF THE UNITED STATES.

STATEMENT OF CLAIMS

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①

When The Names Defendants Herein This 29th Judicial Circuit engage into a conspiracy, to willful take the plaintiff LIFE Liberties, while acting under the color of state law. Should defendant Judge King defendant Judge Hollinsworth, defendant DA Steven Gidden, defendant Judge Fanning, defendant OFFICER YANT, defendant OFFICER LEDBETTER, should have known plaintiff Thomas Gaddis have Constitutional Rights

②

The 4th Amendment provides. NO WARRANT shall be issued but upon probable cause supported by oath or affirmation plaintiff Gaddis have A 5th Amendment Constitution Rights provide, NOR shall any person be deprived of LIFE Liberty or property without due process of law and equal protection of law, plaintiff Gaddis also have A 14th Amendment Constitutional Right provides, That NOR shall any state deprived any person of LIFE, Liberty and property without due process of law or equal protection of law. 42 USC 1983

③

When the 29th Judicial Circuit when they conspired against plaintiff Thomas Gaddis while acting under the color of state law. Should have known, that every person, who under color of any statute, ordinance, regulation, custom, or usage, of any state or territory, subjects or cause to be subjected any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the constitution 42 USC 1983

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The 29th Judicial Circuit of Talladega, Alabama, conspired together, while acting under the color of state law, against plaintiff Thomas Gaddis, a innocent American, citizen, a inhabitant of the United States, The 29th Circuit name defendants herein this 42 USC, 1983 Civil Action, will full took fraudulent, illegal, unlawful, and unconstitutional, criminal, complaints, and initial appearance, documents, and will full stripped plaintiff of all his civil rights, deprivation of the plaintiff constitutional rights, privileges and immunity whereas the plaintiff was secured and protected, defendants disregarded. The laws of the United States, in doing so the defendants cause injuries, to the plaintiff 42 USC 1983.

Emotional harm

emotional pain suffering

mental anguish

1 loss of enjoyment of life

• anxiety distress

• hair loss

• humiliation

• mental distress

• depression

• loss of sleep

• oppression

2 Relationships Loss,

3 loss of self esteem

4 headaches